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United States
Coast Guard

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From: Chief Financial Officer, National Pollution Funds Center

Chief, Office of Response, Marine Safety and Environmental Protection Directorate

To: Distribution

Subj: CERCLA MANAGEMENT AND SUPPORT FUNDING GUIDE

- 1. <u>PURPOSE</u>: This Guide contains Coast Guard standard operating procedures for use of and transactions involving CERCLA Management & Support funds.
- 2. <u>AUTHORITY</u>: The National Pollution Funds Center is responsible for the overall management of the CERCLA Management & Support account, and the Office of Response is the Program Manager for the Coast Guard's Marine Environmental Response Program. This program is the core user of the funds.
- 3. <u>ACTION</u>: All Coast Guard users of CERCLA funds should follow the rules and procedures in this Guide. Please distribute this Guide to your commands and units that receive CERCLA funding. Corrections and suggestions for improvements are welcome. Please forward them to your Cost Center Manager or the CERCLA Account Manager at NPFC.

D. W. Neily By direction

D. G. WESTERHOLM By direction

Encl: (1) CERCLA Management & Support Funding Guide

Distribution: (1) Director, National Pollution Funds Center

- (2) Chief, Office of Response, Marine Safety and Environmental Protection Directorate
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- (4) Chief, Human Factors Division, Health and Safety Directorate
- (5) Chief, Training Division, Marine Safety Schools, TC Yorktown

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Comprehensive Environmental Response, Compensation and Liability Act

(CERCLA)

Management & Support Funding Guide



National Pollution Funds Center United States Coast Guard

March 2001

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SECTION 1. BACKGROUND and PURPOSE

Section 104 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA, 42 USC 9604) became law on December 11, 1980 and authorizes the President to act "Whenever (A) any hazardous substance is released or there is a substantial threat of such a release into the environment, or (B) there is a release or substantial threat of release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health or welfare...." To comply with the first Executive Order (E.O. 12316 dated August 14, 1981), the Coast Guard and the USEPA signed a Memorandum of Understanding (MOU) on January 4, 1982. Following the Superfund Amendments and Reauthorization Act of October 17, 1986, a new Executive Order (12580 dated January 23, 1987) continued delegation of authority and responsibility for response to hazardous substance incidents to the Administrator of the USEPA and the Secretary of the Department of Transportation. Effective May 27, 1988, the two agencies executed the Instrument of Redelegation that assigns all responsibility for remediation of waste sites to the EPA. The 1982 MOU was superseded by a new MOU, dated September 8, 1994, that describes the current funding coordination mechanism that provides the Coast Guard with access to funding from the Hazardous Substance Superfund, the trust fund established under CERCLA.

This Guide addresses CERCLA funds provided for support of the Coast Guard's hazardous substance removal capability. The funds are limited in application, and some procedures for use are different from standard Coast Guard Operational Expense funds. The Guide defines the correct applications and the required procedures. It is published by the CERCLA Account Manager (National Pollution Funds Center) and the Marine Environmental Program Manager (G-MOR).

SECTION 2. INCIDENT-SPECIFIC and MANAGEMENT & SUPPORT CERCLA FUNDS

The Coast Guard uses two kinds of CERCLA (also called Superfund) funds: Management and Support (M&S) funds, also called non-incident funds, and incident specific funds. Incident specific funds are used to respond to hazardous substance incidents in the Coastal Zone, including costs for contractors, and Strike Team operations. Guidance for use of incident specific CERCLA funds is in the National Pollution Funds Center Reference Guide and the National Contingency Plan.

The Coast Guard's CERCLA M&S funds are used for the functions, activities and equipment/property purchases needed to build or maintain the Coast Guard's capability to respond to hazardous substance incidents in the Coastal Zone. This includes training, response equipment and its maintenance, hazardous substance spill drills and exercises, NRT/RRT meetings and support costs, medical support, and National Response Center communications capability. In addition, the National Contingency Plan (40 CFR 300) categorizes the Coast Guard National Strike Force (NSF) as a Special Force, a national asset, available to assist any OSC in either the coastal or Inland Zone. CERCLA M&S funds are used to build NSF capability to respond to releases of hazardous substances.

There are five cost centers responsible for these funds: Commandant (G-MOR), Commandant (G-WKS), TRACEN Yorktown, the National Response Center (G-OPF), and the National Pollution Funds Center (NPFC). G-MOR coordinates the use of CERCLA funds by the National Strike Force (the NSF consists of the Atlantic, Pacific and Gulf Strike Teams and the National Strike Force Coordination Center), Coast Guard districts and field units. In addition to the discretionary use of these funds, a number of Coast Guard billets/positions are designated as reimbursable and are paid from Superfund.

All funding from the Superfund for all Federal Agencies passes through EPA. The Coast Guard submits budget requests to EPA two years in advance for inclusion in EPA's submission to OMB and then the Congress. The amount appropriated by Congress is included in EPA's budget and they convey it to the coast Guard in an IAG. This budget process is the only way the Coast Guard receives CERCLA M&S funding.

Each fiscal year, an Interagency Agreement (IAG) transfers the funds from the EPA to the Coast Guard. Based on the amount of funding transferred in the IAG, the Coast Guard establishes the AFC-88 reimbursable accounts and bills EPA for reimbursement of expenditures against the accounts.

SECTION 3. CERCLA FUND USE

CERCLA M&S funds may be used only for support of the Coast Guard's <u>hazardous</u> <u>substance response capability</u>. It is important to note that the DOT Inspector General conducts audits of the use of CERCLA funds. Training is a common use, but a training course that addresses oil spills in its title demands justification and is probably not appropriate for these funds. DOT auditors have challenged the use of CERCLA funds to purchase an item for general use at a unit. The most easily justified procurement is for an item or service that is used exclusively for hazardous substance response capability. More difficult, but still possible, is a procurement that is essential for the hazardous substance response mission, with occasional additional use for other purposes. An item intended to support multiple purposes or programs should be purchased with funds from sources appropriate to each of the purposes or programs. For general use items, this would mean Coast Guard AFC-30 funds in addition to the CERCLA funds. Exclusive use of CERCLA funds may be considered only if the other uses are incidental and incur no additional CERCLA costs, and CERCLA activities always have priority. Prudent judgment is required in this case.

APPENDIX F contains the list of approved training and examples of activities, materials, and equipment that have been deemed acceptable uses of CERCLA funds at the field level. This is not an exhaustive list.

SECTION 4. INVENTORY & REPLACEMENT

The majority of CERCLA property and equipment is held in the National Strike Force hazchem response inventory, which is used for both training and incident response. When equipment from the inventory is consumed or ruined during a CERCLA response, the full cost of replacing the equipment is charged to the CERCLA incident account rather than the M&S account.

The M&S budget shall only fund the following equipment purchases:

- Equipment consumed during training;
- New items added to the inventory, and;
- Other property needed to support haz-chem response capability but not bought for a specific response.

SECTION 5. ANNUAL BUDGETS

There are annual formulation and execution cycles for the CERCLA budget which are part of the annual federal budget process, but they do not follow the Coast Guard budget process. All CERCLA funds used by Federal agencies are obtained through the Environmental Protection Agency's budget, and all Coast Guard CERCLA budget activity is conducted through EPA.

NPFC and the primary cost center managers use a Budget Model (think of it as a standardized budget plan) to manage the budgeting of these funds. First, it is used to estimate the funding we will need in two years (FY+2); this is input for the budget request that we present to EPA two years in advance of the budget year (formulation). Second, it is used to distribute the available funds in the beginning of each fiscal year following EPA's confirmation of the exact amount we get from the Superfund budget that they get from the Congress (execution).

It is important for Coast Guard CERCLA fund managers at all levels to understand the Budget Model and use it carefully. NPFC needs a solid basis for estimating and justifying the FY+2 budget request. Cost Center managers need to plan for the things that the Model will fund and the things not included in the Model, both in FY+2 and in the beginning of each new FY. We must work with the Budget Model twice a year.

A. Budget Formulation

In the spring, the input estimates for the FY+2 budget request must be constructed. To some extent, this is really a validation that the Budget Model accurately describes the way we expect to conduct business in two years. NPFC and the primary cost center managers build the FY+2 budget request on this input. NPFC partners with G-MOR to prepare the final document for presentation to EPA management. The date for submission to EPA can be as early as mid-May or as late as the second week in July. If the FY+2 formulation is accurate and EPA is successful in obtaining funds, the total funding will be sufficient for the total need.

B. Budget Execution

Prior to October 1, the beginning of the FY, NPFC works with the primary cost center managers to develop a spend plan that is fair to all users and maximizes the benefit of the CERCLA funds to the Coast Guard. This requires the users to review the Budget Model again and provide specific data for the coming year. This is not a repetition of the FY+2 formulation process, because execution both allows and requires the application of better knowledge of the specific conditions in each unit for the approaching fiscal year. For instance, specific personnel

onboard and expected rotations should be known, and this allows exact training needs to be identified. Near the beginning of the fiscal year, EPA notifies the Coast Guard of the amount of funding in the budget from Congress. If total funding is less than the need, the Model provides a rational way to optimize the benefit of the available funds with minimum damage to individual units and the Program.

C. Spend Down Rates

CERCLA funds must be managed with the same discipline that applies to OE funds (AFC-30, etc) and excessive spending at the end of the fiscal year indicates a lack of discipline. The annual funding letter specifies the Spend Down Rates for the year, and the procedures are similar to the OE procedures. Funds must be obligated in DAFIS by the specified dates, or the CERCLA Account Manager in NPFC will rescind unobligated differences. For planning purposes, assume that 45% of your budget must be obligated by the end of the second quarter (31 March) and 70% by the end of the third quarter (30 June). Final rates will be in the budget letter at the beginning of each fiscal year. To assure that the Account Manager does not rescind any funds, check your PES reports periodically to verify that transactions in LUFS have communicated correctly with DAFIS. If DAFIS does not reflect all of the valid transactions in your LUFS system or if there are other reasons to delay obligation of funds, send correspondence (e-mail is acceptable) to the Account Manager in NPFC requesting an extension. Field units should send a copy to the appropriate Cost Center Manager (G-MOR or G-WKS).

D. End of Year Spending Deadline

On the 1st of September, the Account Manager rescinds all unobligated balances in DAFIS. Verify that all of your obligations in LUFS are recorded in DAFIS. If DAFIS does not contain all of your transactions, send correspondence to the Account Manager. Field units should send a copy to the appropriate Cost Center Manager (G-MOR or G-WKS). It is very important to verify that all LUFS transactions are recorded in DAFIS. Obligations that hit DAFIS late will cause a deficiency in the CERCLA account, and those responsible will have to provide an alternative source to fund the deficiency. If you are certain that you have obligated funds and that the obligation will be executed but the obligation is not recorded in DAFIS, send correspondence to the CERCLA Account Manager in NPFC prior to 1 September. Field units should send a copy to the appropriate Cost Center Manager (G-MOR or G-WKS).

If you have plans to obligate CERCLA funds in September and have the funds in your budget, send a September spending plan that details and justifies the use of CERCLA funds in September to the CERCLA Account Manager in NPFC no later than 15 August. Field units, send correspondence to your Cost Center Manager. September spending must be guaranteed to go to completion. You may not retain funds for contingencies. If you have serious contingencies to consider, include them in your September spending plan or a fallout request (see below).

E. Fall-Out Funding

In August, Cost Center Managers should consolidate their lists of unfunded or unexpected needs and forward them to the Account Manager for possible fall out funding. If the Account Manager can identify unobligated funds after the 1st of September, requests for the use of those funds will be prioritized and funds will be distributed. Do not request fall out funds if you are not certain the funds can be obligated before the end of the fiscal year.

SECTION 6. ACCOUNTING PROCEDURES

A. Appropriation Limitation Code (LIM) Conflicts

DAFIS has limitations that can affect the way some Cost Center managers have to manage account lines. When two different units (or users) have CERCLA account lines with the same LIM code (Appropriation Limitation Code), there can be conflicts in document numbering, even if they use different Cost Center Codes (usually the unit's OPFAC number). If two transactions, one from each unit, have the same Document Control Number (DCN), the second transaction entered into DAFIS (not LUFS – DAFIS is where the transaction information goes after transmission by LUFS) will fail.

To prevent this, account line managers (district CERCLA managers and others who have a CERCLA budget and a unique CERCLA account line) should assure that their units or spenders use unique Document Control Numbers. This is not a problem across district lines, because each district has its own LIM code which makes the account lines different, and the Procurement Site Codes in the DCNs are different for each district. One possibility for districts is a process whereby each MSO or spender is assigned a unique sequence of document numbers (logbook numbers): i.e., the district office gets 1-99, MSO A gets 100-199, MSO B gets 200-299, etc.

B. Object Class

Use only the Object Class codes listed in Appendix "C" of this Guide. There are other valid Object Class codes in the accounting system, but they may not be appropriate uses of CERCLA M&S funds. Even this list of selected codes must be used with care. Availability of a code in Appendix C does not imply approval of such items in your budget if they would not otherwise be appropriate uses of CERCLA funds. If it is necessary to use a code that is not in Appendix "C," contact the CERCLA M&S Account Manager in NPFC.

Object Class codes are important because the Coast Guard's financial reports to EPA are sorted on Object Class. In addition, an Object Class code could indicate an inappropriate use of CERCLA funds and even a violation of law. For example, codes 2642 and 3110 (supplies and non-capitalized equipment) are for the Environmental Compliance and Restoration Program that addresses pollution caused by the Coast Guard or on Coast Guard-owned sites. CERCLA M&S funds may not be used for such internal agency cleanups.

C. Large Unit Financial System (LUFS)

All CERCLA transactions should be conducted through LUFS. All of the management and reconciliation tools in LUFS should be used as needed to assure the correct entry of all transactions, deobligation of unused balances, and identification and correction of erroneous transactions charged to your CERCLA account.

Sometimes LUFS support is not available in the office that manages CERCLA funds and it must be obtained from a different part of the unit. Proper management of CERCLA funds is not optional, even if it is difficult to obtain effective LUFS support. Contact the staff running LUFS and work out a support arrangement. If that does not work, use your chain of command and demand support. If that cannot be done, contact your cost center manager or the CERCLA manager in NPFC, because failure to properly manage these funds will result in a reduction or loss of funding.

D. Program Element Status (PES) Reports

Proper management of an account using LUFS NT requires reconciliation of the Program Element Status (PES) reports, which are downloaded weekly, against the transactions in your CERCLA account. The LUFS staff can assist you, but you must determine the status and validity of all transactions against your account. Only you know which transactions are valid. The best status report on reconciliation is the 5-line report. Absent a 5-line report, you cannot accurately describe the status of your CERCLA account. If PES reports are not available, contact Customer Service at FINCEN (757-523-6940). If the problem cannot be resolved that way, contact NPFC for assistance.

E. `Change in Financial Plan (CIFP)

Transactions that require a Change in Financial Plan are allowed only when they adhere strictly to the funds flow pattern below. When CERCLA funds are transferred by an incorrect CIFP out of AFC-88 into a different AFC, the accounting records show a reduction in the CERCLA funding available rather than an expenditure. This conceals the audit trail for those funds and prevents the reimbursement process from working. Absent reimbursement, Coast Guard OE funds must be charged and from a financial perspective the transaction ceases to be a CERCLA transaction.

Funds flow pattern for CERCLA CIFPs:

2/H/101/8nn/88/0/8n (--) this is your account line 2/H/101/899/80/0/SK (+)

2/H/101/399/75/0/SK (--)

2/H/101/1nn/30/0/prog. el. (+) this is the targeted account line

The CIFP must be routed for approval through the CERCLA account manager in NPFC and Ms. Loretta McRae in G-CBU.

CIFPs may be required when a CERCLA spender wants to procure equipment or services from a large contract that is funded from a single AFC-30 account or other non-CERCLA account. To use such contracts, it is necessary either to add money to the AFC-30 account that was originally obligated to establish the contract or to amend the contract to recognize an additional source of funds (contracting officers are usually unwilling to amend such contracts). Transferring funding from another AFC-30 account does not require a CIFP, which is the reason such contracts are not usually a problem. Plan ahead, and do not plan to use contracts that can only be funded from specific AFC-30 accounts.

SECTION 7. RECORD KEEPING AND AUDITS

There is a requirement in CERCLA for the Inspector General of each Department using CERCLA funds to conduct an annual audit of all transactions to assure proper administration and use. All users of CERCLA funds should act with full accountability just as for any of their official actions, but this audit requirement brings the accountability into better focus. The transactions must follow the established accounting protocols and the purpose of each transaction must be appropriate for CERCLA funds.

All users of these funds are required to keep records of each transaction and must be able to account for all transactions recorded against the accounting strings entrusted to their use. This responsibility begins with the five cost center managers (G-MOR, G-OPF, G-WKS, TRACEN Yorktown, and NPFC). In the case of G-MOR, there are NSF and district managers responsible for accounting strings assigned to the G-MOR cost center. Each district CERCLA funds manager (and each unit CERCLA funds manager if so directed by the district) is required to validate all transactions charged against the manager's CERCLA account line and make corrections if needed.

This audit accountability extends to the property and equipment purchased with CERCLA funds. The inventory of CERCLA equipment must be complete and correspond to the procurement records.

SECTION 8. CERCLA PROPERTY MANAGEMENT

The Coast Guard Property Management Manual, COMDTINST M4500.5, states in Chapter 1 that custodians have the responsibility to maintain "current custodial records" for property which they have signed for. This responsibility must be taken seriously. Property purchased with CERCLA funds is subject to the Coast Guard accountability requirements, but there are some unique features.

The Memorandum of Understanding (MOU) between the Coast Guard and EPA (titled "Procedures for United States Coast Guard Access to SUPERFUND, to Support Coast Guard Implementation of CERCLA") places two specific requirements on the Coast Guard's use of CERCLA funds to procure property:

- USCG must maintain an up-to-date inventory of CERCLA property, and
- USCG must consult with EPA prior to disposition of CERCLA property with an aggregate fair market value of \$1000 or more to assure the disposition method properly reflects the interests of Superfund.

A. Property Records

The purchaser must enter all non-consumable property purchased with CERCLA funds and with a cost of \$500 or more into the Coast Guard's Oracle Fixed Assets Management (FAM)-system.

The entry of CERCLA property into FAM requires two additional notations to flag the item as belonging to the CERCLA inventory. In the field titled "Item Name Code", the purchaser of the item must enter "CERCL." The notation is a truncation of CERCLA, because there are only 5 spaces in the field. In the field titled "Local Use", the purchaser must enter "CERCL." This is also a 5-character field.

Use the automated features in FAM and LUFS to access data for entry into FAM. The entry of the "CERCL" notation into the "INC" and "Local Use" fields is entirely manual as is the entry of the serial number of the item, which is ordinarily not available until delivery.

B. Disposal

Disposal of CERCLA property does not follow standard Coast Guard rules. Prior to disposal, the Coast Guard must notify EPA to assure they agree that the method of disposal reflects the interests of Superfund. In addition, CERCLA property with residual value cannot be given away or transferred to non-CERCLA use; it must be sold and the proceeds returned to Superfund.

Executive Order 12999 authorizes transfer of excess computers and related equipment to schools and non-profit organizations, but it does not apply to CERCLA funded property.

1. Transfer. When CERCLA property with useful life remaining is no longer needed where it is located, try to find an alternative CERCLA-related use within the Coast Guard. A transfer to another CERCLA user within the Coast Guard is not disposal. Use SF-1149 and assure that FAM is updated to show the correct location for the item.

A transfer of CERCLA property to a CERCLA user in another federal agency requires EPA approval first. The Coast Guard does not have the authority to transfer the property directly to a state or local entity for CERCLA use. This would be a grant and the funding agreement with EPA does not include authority for the Coast Guard to issue CERCLA grants.

A transfer to a non-CERCLA Coast Guard user is not allowed without payment to Superfund. Removal of the property from CERCLA use is disposal (from the CERCLA perspective), and the new Coast Guard user must pay the fair market value for the property. Prior to completion of such a transaction, NPFC has to notify EPA. Please contact the CERCLA account Manager in NPFC for further guidance in transferring the funds.

A transfer of CERCLA property to any other non-CERCLA-related party (federal, state, local or non-profit) is disposal and requires sale.

- **2. Notification.** For property with an aggregate fair market value of \$1000 or more, send correspondence to the CERCLA manager in NPFC(cf-2) describing the property and the proposed method of disposal. Include item description, model number, condition, and any other information needed to understand the item (such as age) so that EPA can consider alternative uses and disposal methods. Include proposals, if any, to transfer the property to another <u>federal</u> CERCLA user. The CERCLA manager will notify EPA. Form CG-5269 (Report of Survey) contains all key information and may be used in lieu of letter correspondence.
- **3. Disposal through DRMO or GSA**. When no alternative CERCLA uses within the Coast Guard have been found and EPA has been notified and has concurred, transfer property with remaining value to the General Services Administration (GSA) or the Defense Reutilization and Marketing Office (DRMO) for sale. On the transfer form SF 120 or DD 1348-1, indicate that this is CERCLA property and the proceeds from the sale are to be deposited into US Treasury Account 20X8145.3 (Superfund receipts).

C. Standard Rates

When non-expendable equipment (able to be used more than once) is used for an incident response, a standard rate must be included in the documentation of costs for the incident. When an item in the inventory is replaced, review the standard rate to assure that it applies to the new equipment. Cost of the item or number of expected uses may have changed. When a new type of response equipment is added to the inventory, a standard rate must be created. Contact the Business Analysis Division (G-CFS-2) in the Directorate of Finance and Procurement in Headquarters. G-CFS-2 will need the following information to construct the rate:

- Full cost of the item (including any modifications)
- Residual value estimated salvage (or trade-in) value when this item will be replaced
- Annual warehouse cost based on annual rent plus O&M cost for the facility where the item is stored
- estimated equipment life in days of use
- Projected days of use per year
- Preventive maintenance cost per year (does not include repair or refurbishment due to use)

If these variables do not appear to apply to the item for which a rate is needed, consult with G-CFS-2 to determine the best way to proceed. Documentation of response cost involving the use of an item with a standard rate includes the standard rate times the number of standard rate units used, plus the following:

- Personnel costs for operating the equipment, if not recorded elsewhere
- Refurbishment and repair related to use
- Mobilization and demobilization costs
- Shipping cost
- Disposal costs, if any
- Consumables needed for the equipment, if any

D. Capitalized Property

The minimum threshold for capitalized property is \$25,000. It is essential to select the correct Object Class for the accounting data when making a capital purchase. Note that the same item will have a different object class when cost exceeds \$25,000. The additional management and record keeping requirements for capitalized property are automated, but the correct Object Class must be used for the automation to work.

SECTION 9. QUARTERLY REPORTS

The five cost center managers (G-MOR, G-OPF, G-WKS, TRACEN Yorktown, and NPFC) are required to report quarterly on progress in achieving the fiscal year's plan for these funds. Within the G-MOR cost center, the each District will submit a consolidated report that includes all district units, and the National Strike Force Coordination Center will submit a consolidated report that includes the three Strike Teams. All subordinate units with CERCLA M&S funds are required to submit quarterly reports to the command providing their CERCLA funds. Districts and the National Strike Force submit their reports to Commandant (G-MOR). G-MOR, G-OPF, G-WKS, and TRACEN Yorktown submit reports to NPFC.

A. Reporting Dates

Reports are due at the NPFC by the 21st of the month following the end of the quarter. The report consists of the following:

B. Report Form

An Excel form is used to record the routine statistical measures of activity and accomplishment (see Appendix G). The form captures the following data:

1. TIME MEASUREMENT. The measurement of time for training (for both instructor(s) and students) and other CERCLA activities serves three purposes:

- a) The MOU and the annual IAG require "Documentation" for the Coast Guard's CERCLA reimbursed billets and positions. Such documentation does not naturally exist in the Coast Guard, an organization that does not use time cards. The time data in the Quarterly Reports is converted to a count of Full Time Equivalents (FTEs) (both billets and positions). The FTE number is used as surrogate documentation (justification) to satisfy the requirements of the MOU and the IAG. So, please provide comprehensive estimates of time spent on <u>all</u> CERCLA related business use the space marked "Other CERCLA Activity" whenever necessary.
- b) The Coast Guard Program Manager uses the data to understand training needs and workload.
- c) The data provides a substantive set of measures to report to EPA, which helps the Coast Guard to compete for available funds in the Superfund budget and helps EPA justify funding that may be threatened in the administration or by congressional political processes.
- **2.** TRAINING. Appendix F of this Guide shows the training considered most important by program managers. If you feel you must use the "Unlisted Course" line too much for unlisted courses that you consider valuable or necessary, please send correspondence to G-MOR, copy to NPFC, and provide identification of the course(s) plus justification for their importance. G-OPF, G-WKS and TRACEN Yorktown contact NPFC directly. This part of the report is intended to be useful for management in the Coast Guard and not just a recitation of numbers in a report. Please be proactive in keeping the list of courses relevant.
- **3.** Individual units and districts do NOT report training figures for members attending PODC and MSPOC. TRACEN Yorktown reports these figures.
- **4.** In addition to the actual training hours, TRACEN Yorktown (and any other unit offering training) should include staff-hours for class/exercise setup, maintenance of publications and equipment, training of staff, and administration.
- **5.** The National Response Center (G-OPF) should include the number of CERCLA and non-CERCLA discharge reports processed, and the number of CERCLA-related FOIA inquiries.

C. Submit Corrections

In the 2nd, 3rd and 4th quarters please include a separate form with adjustments for the prior quarter(s), if you discover that adjustments are needed. Care should be taken to assure that all reports are as accurate as possible.

D. Narrative Section of Report

Attach additional page(s) to the form containing a narrative description of the following (for an example, see Appendix G):

- **1.** A summary of any significant CERCLA events including but not limited to chemical responses, chemical training, chemical exercises and meetings.
- **2.** Suggestions for improving business practices. If problems are identified, recommend solution(s).

This is a very important part of the report. The narrative record is the only consistent record available to the managers in HQ and NPFC describing events and activities. Such descriptions carry weight in management choices within the Coast Guard and in the management dialogue with EPA.

SECTION 10. OTHER END OF QUARTER & END OF YEAR REQUIREMENTS

The MOU requires the Quarterly Reports to include an inventory of CERCLA property acquired year to date and an accounting of obligations sorted by EPA specified budget categories. NPFC will provide these parts of the quarterly reports, but the users must assure that the records in the property and accounting systems are completely accurate.

A. Validation of FAM Entries

It is the responsibility of the users to assure that all non-consumable CERCLA property is recorded in **FAM** with "CERCL" in the Item Name Code and Local Use fields no later than the end of the quarter. Relocations and deletions of property must also be entered. Cost center managers and sub-managers are encouraged to require their units to provide reports designed to assure compliance with these requirements.

B. Reconciliation of Accounts

Similarly, all users must review, validate and correct ALL transactions charged to their respective accounts no later than the end of the quarter. Use of the reconciliation tools in LUFS can simplify this process. Cost center managers and sub-managers are encouraged to require their units to provide reports designed to assure compliance with this requirement. If necessary, the NPFC can be contacted to obtain a summary of DAFIS activity under a particular account.

C. Deobligations & Prior Year Transactions

The last step in any transaction is to reconcile the data in the accounting system (LUFS). Specifically, as soon as a transaction is complete and the final expenditure is available in LUFS, the CERCLA manager responsible for the account and the transaction must verify that no obligated balance (also called a UDO or UnDelivered Order) remains in the accounting system. Quarterly and annually, the manager should review all of the open obligations in the account.

Any obligation that is not needed for further (possible) expenditures must be reduced to zero. This is called a deobligation. A balance remaining in a contract obligation or purchase order (document type 24 and 23) is normally eliminated by amending the contract or purchase order down to the exact value of the total paid on the invoice(s). Failure to do this prevents your unit or any other unit from spending those balances.

Each manager is responsible for managing all transactions against his/her CERCLA account line, <u>including prior fiscal years</u>. Particular attention should be devoted to prior year UDOs in the account. It may not be possible to close a prior year account if a UDO must remain open for that year. It is entirely valid to keep an obligation open for years, but the manager must be able to identify and defend any prior fiscal year obligations remaining open in his/her account.

SECTION 11. DAFIS ACCOUNTING DATA FOR CERCLA TRANSACTIONS

A. Construction of DAFIS Account Lines

	FORMAT: X - X - X (1) (2)		X - X - XXXXXX - (5) (6) (7)	XXXXX - XXXX (8) (9)
(1)	Agency	1-digit	2 = Coast Guard	
(2)	District/Region	1-digit	Always = H for CEF	RCLA Mgt. & Support
(3)	Appropriation	3-digit	Position #1 = Last d Position #2 & 3 = 02 expense, i.e. OE Ap	1 (indicates operating
(4)	Appropriation Limitation Code (LIM Code)	3-digit	Position #1 = 8 (rein Position #2 & #3 = 2 spending Unit (See 2)	ATU for authorized
(5)	Allotment Fund Code (AFC)	2-digits	Always = 88	
(6)	Allotment Level Indicator	1-digit	Always $= 0$ (This fie	eld is not used by CG .)
(7)	Program Element	2-digits	88, except as below: Medical = 87 NRC = 89 AST = 81 PST = 82 GST = 83	(NOTE – These distinctions are necessary for the Program Element Status (PES) Reports to be generated correctly.)
(8)	Cost Center	5-digits	The OPFAC# of the (See Appendix "B"	authorized spending unit
(9)	Object Class	4-digits	(See Appendix "C"	?)
SYSD	ATA Field:	5-digits	Position #1 = H Position #2-#5 = for NPFC and FINCEN (district or cost center (Enter this data in the LUFS or write it in a	ole Agreement Number our-digit number assigned by for each account line er) each year. The System Data field in a text block on paper ligation documents.)

B. Construction of DAFIS Document Control Numbers

FORMAT: XX - XX - XX - X - X - XX - XXX - XXX (1) (2) (3) (4) (5) (6) (7) (8)

(1)	Document Type 2-dig	gits	DAFIS document type (See Appendix "D")
(2)	Fiscal Year	2-digits	xx = Last two digits of current Fiscal Year (i.e., the funding year).
(3)	Procurement Site Code	2 -digits	23 = CGHQ (For others see Appendix "E")
(4)	Fiscal Year	1-digit	x = last digit of the FY (usually the current fiscal year, but could be a prior year; for contracts, use FY of initial contract award.)
(5)	Region/District	1-digit	H (CERCLA Mgt. & Support always uses H)
(6)	Program Element	2-digits	88 (CERCLA Mgt. & Support always uses 88 in the Program Element component of the Document Control Number.)
(7)	Document Sequence unit Number	3-digits	xxx = Unique sequential number assigned by preparing the document
(8)	Suffix	3-digits	Usually 000 (001 could be the 1 st amendment to a contract or travel order)

APPENDIX "A" ADMINISTRATIVE TARGET UNITS (ATUs)

CCGD1	Boston, MA	01
CCGD5	Portsmouth, VA	05
CCGD7	Miami, FL	07
CCGD8	New Orleans, LA	08
CCGD9	Cleveland, OH	09
CCGD11	Alameda, CA	11
CCGD13	Seattle, WA	13
CCGD14	Honolulu, HI	14
CCGD17	Juneau, AK	17
MLC - Atlantic, Portsmouth, VA 3		
MLC - Pacific, Alameda, CA		33
CG Finance Center, Chesapeake, VA		36
National Strike Force		58
NPFC, Arlington, VA		72
TRACEN Yorktown		75
CG Headquarters		99
Marine Safety Center	39	

APPENDIX "B" COST CENTER CODES (OPFAC Numbers)

DISTRICT OFFICES:		OTHER	
Boston (1)	71101	G-MOR	70586
Portsmouth (5)	71105	G-WKS	70456
Miami (7)	71107	MLC - LANT	75130
New Orleans (8)	71108	MLC - PAC	75160
Cleveland (9)	71109	NPFC	74100
Alameda (11)	71111	NRC	70529
Seattle (13)	71113	TRACEN Yorktown	63100
Honolulu (14)	71114	Marine Safety Center	70411
Juneau (17)	71117		
MSOs and Activities (Alpha	hetically):		
Anchorage	33280	Morgan City	33293
Baltimore	73133	New Orleans	33292
Boston	33200	New York	73136
Buffalo	33254	Paducah	33205
Charleston	33233	Philadelphia	33211
Chicago	33247	Pittsburgh	33206
Cleveland	33253	Port Arthur	33241
Corpus Christi	33240	Portland, ME	33285
Detroit	33250	Portland, OR	33270
Duluth	33287	Providence	33286
Galveston	33265	Puget Sound	33271
Grand Haven	36257	San Diego	33255
Guam	33296	San Francisco Bay	33260
Hampton Roads	33220	San Juan	33239
Honolulu	33275	Sault Ste Marie	36259
Houston	33244	Savannah	33232
Huntington, WV	33207	St. Louis	33201
Jacksonville	33231	Tampa	33230
Juneau	33281	Toledo	33252
Los Angeles/Long Beach	33261	Valdez	33283
Long Island Sound	36229	Wilmington	33225
Louisville	33209	-	
Memphis	33204	NSFCC	34359
Miami	33215	Atlantic Strike Team	34361
Milwaukee	33248G	Gulf Strike Team	34340
Mobile	33214	Pacific Strike Team	34360

APPENDIX "C" LIST OF SELECTED OBJECT CLASS CODES

(See FINCEN SOP Appendix F for complete descriptions)

Object Class	Description
1133	Intermittent Appointments
1151	Overtime
1152	Holiday Pay
1153	Sunday Pay
1154	Night Pay
117J	TAD/TEMAC/SADT Pay, Commissioned & Warrant Officers
117K	TAD/TEMAC/SADT Pay, Enlisted
2100	US Travel – Site Visit – Operational Travel
2101	US Travel – Information Meeting
2103	US Travel – Conference Attendance including speech, presentation, or participation
2109	US Travel – Other/Program support
2110	Overseas Travel – Site Visit – Operational Travel
2113	Overseas Travel – Conference Attendance (inc. AK, HI, Caribbean & Pac. Islands)
2119	Overseas Travel – Other/Program Support
2133	Civilian Training Travel – Gov't & non-Gov't., short term & long term
2150	Officer Training Travel
2151	Enlisted Training Travel
2171	Lease of Motor Vehicles, Government (paid to other Gov't Agencies)
2172	Lease of Motor Vehicles, Commercial
2199	Late Payment Interest Penalty—Travel
2201	Mail & Messenger Services
2204	Rental – Trucks & Other Equipment
2210	Transportation of ADP equipment and software
2211	Transportation of Gov't Property
2223	Transportation of Things – Other
2299	Late Payment Interest—Transportation
2323	Office Space – Regions, Field Offices – Other Than GSA (rental of office space)
2326	Rental of building or space – not GSA
233A	Other Communication Services (not classified elsewhere)
233B	Rental – ADP Equipment
233C	Rental – ADP Terminals & Other Peripherals
233E	Rental – Duplicating Equipment (includes copy and service charges)

Object Class	Description
233F	Rental – Telephone Equipment & Systems
233H	Rental – Other Equipment (not classified elsewhere)
233X	Telecommunications Services – Commercial
2334	Leased Radio Equipment
2335	Local telephone service & installation (not through DOT Working Capital Fund)
2338	Mail & Messenger Services – Postage (for costs not provided through the OST Working Capital Fund. Includes payments to the Postal Service & express mail service for letters. Excludes Parcel Post & express mail service for freight.)
2399	Late Payment Interest Penalty – Rent, Communications & Utilities
2402	Visuals & Graphics Services (includes design & layout of pubs, exhibits, illustrations, charts, awards, etc., not provided through OST Working Capital Fund)
2404	Hot Copy Services – in-house photocopying services not provided through the OST Working Capital Fund
2409	Printing & Reproduction
2411	Printing & Reproduction – Training (manuals, aids, curriculum materials, etc.)
2499	Late Payment Interest Penalty – Printing & Reproduction
2508	Audiovisual Services
251E	Consulting Service – Mgmt & Professional Support Services
251F	Consulting Service – studies, analyses & evaluations – policy, etc.
251G	Consulting Service – Engineering & Technical Service
252B	ADP Contract Support Services
252D	ADP Systems Analysis & Programming
2521	Contractual Services – DOD Agencies (includes DCAA charges)
2522	Contractual Services – Other Gov't Agencies (includes reimbursable agreements)
2523	Contractual Services – Other
2534	Maintenance & Repair – ADP Equipment
2537	Maintenance & Repair – Electronic Equipment
2538	Maintenance & Repair – Office Furniture & Equipment
2539	Maintenance & Repair – Operating Equipment—Technical
2540	Maintenance & Repair of structures, vehicles & equipment at shore units
2544	Maintenance & Repair—MER Pollution Equipment
255F	Technical Services—Other
2559	Training – Facilities (rental of conference rooms & related services)
256D	Training – Non-Gov't – All

Object Class	Description
256G	Training – Government – costs rel. to on-duty training provided by a Fed. agency
2561	Training – Officers
2562	Training – Enlisted
2563	Training – Other
2596	Other Services – Not Otherwise Classified
2599	Late Payment Interest Penalty – Other Services
2608	Automatic Data Processing (ADP) Supplies
2609	Automotive Lubricants, Maintenance & Supplies (general & special purpose vehicles including heavy equipment
2617	Supplies to repair & maintain electronic equipment
2643	Equipment Maintenance Materials, including tools & replacement items
2655	Laboratory, Scientific & Testing Supplies
2656	Marine Environmental Response (MER) Equipment – Supplies & Materials (spare parts, maintenance, etc.)
2660	Medical Supplies – Nonfederal, Noncontract Sources
2662	Office Supplies
2664	Periodicals, Newspapers, Pamphlets & documents
2668	Photographic Supplies
2669	Safety Supplies (safety devices & personnel protective equipment)
2674	Shore Units – Housekeeping
2675	Shore Units – Maintenance Supplies
2676	Shore Units – Supplies & Materials
2684	Telecommunications & Telephone Supplies
2687	Training – Training Materials
2696	Other Supplies, not otherwise classified
2697	Lost Discounts – Supplies
2699	Late Payment Interest Penalty – Supplies
3104	Audio Visual & Photographic Equipment – Noncapitalized
3105	Automatic Data Processing (ADP) Equipment – Noncapitalized
3111	Furniture & Office Equipment – Noncapitalized (includes filing & storage, copiers, calculators, etc)
3115	Machinery – Noncapitalized
3116	Marine Environmental Response (MER) Equipment—Noncapitalized (Purchase of containment, recovery, sensing, control, data reduction, and communication equipment primarily designed for the MER Program.)
3120	Operating & Technical Equipment – Noncapitalized (includes tools, portable & benchtop machinery, instruments, work stands, etc.)

Object Class	Description
3123	Safety Equipment – Noncapitalized
3125	Sensitive, Special Purpose Equipment – Noncapitalized. (Items considered sensitive including cameras, televisions, appliances, gauges, etc.)
3127	Telephone Equipment – Noncapitalized (includes modifications to existing systems and installation)
3128	Test Equipment – Noncapitalized (for measuring & calibrating other equipment)
3129	Training Equipment – Noncapitalized (training aids)
3130	Automatic Data Processing (ADP) Software Noncapitalized
3140	Other Equipment – Noncapitalized, not otherwise classified
3146	Automatic Data Processing (ADP) Equipment – Capitalized (over \$25,000)
3147	Automatic Data Processing (ADP) Software—Capitalized (over \$25,000)
3148	Books for Permanent Collections (administrative, technical, legal, medical)
3154	Furniture & Office Equipment – Capitalized (over \$25,000)
3159	Marine Environmental Response Equipment (MER) Equipment – Capitalized (over \$25,000)
3169	Telephone Equipment – Capitalized (equipment, installation, expansion & modification—over \$25,000)
3178	Other Equipment – Capitalized, not otherwise classified (over \$25,000)
3197	Lost Discounts – Equipment
3199	Late Payment Interest Penalty – Equipment
3202	Buildings – Additions, Improvements that significantly extend useful life or increase capacity for service (excludes repairs, modifications, relocations, replacements)
3299	Late Payment Interest Penalty – Land & Structures

APPENDIX "D" DAFIS DOCUMENT TYPES

01 - Appropriation	42 - Janitorial contracts
02 - Apportionment	43 - Other fixed contracts
03 - Non expenditure transaction	44 - Utility / electric
04 - Allotment (Funds)	45 - Utility / telephone
05 - Allotment (Contract Liquidation Authority)	46 - Utility / water
06 - HQ program plan	47 - Gasoline & Oil
07 - Regional plans	48 - SIBAC - Recurring
08 - Project Authorization	49 - Utility/Natural Gas
09 - Activity plan	51 - Reimbursement Agreement - Direct Charge (MIPRs)
11 - TAD/TDY travel orders	52 - Reimbursement Agreement - Overhead, Operations
12 - PCS travel orders	53 - Reimbursement Agreement - Overhead, GF
13 - Reserve travel orders	55 - Accounts receivable
14 - GTR (PCS & TAD)	56 - Other accounts receivable
15 - GBL (PCS & TAD)	61 - Imprest Funds / SF 1129
16 - Blanket GTRs	62 - Canceled checks / SF 1098
19 - Miscellaneous	63 - Disbursement-non-federal Obligations
20 - Cash	64 - Collections - confirmation
21 - Procurement requests (Brown Sheets)	65 - Disbursements - confirmation
22 - Purchase order-Invoice-Voucher (SF-44)	66 - Collections
23 - Purchase order	68 - Collections - debit voucher
24 - Contracts	69 - Disbursement/Collections Adj.
26 - PO Dining facility	70 - Payroll collection
27 - Auxiliary orders	71 - Payroll gross costs
28 - Interagency agreements	72 - Payroll - schedule of disbursement (Reserve Pay)
30 - Training	73 - Supplementary payments & adjustments
31 - Work order-utilities-GSA	74 - IOTV - costs
32 – IMPAC / credit card	75 - IOTV - obligations & costs
33 - Purchases/miscellaneous	77 - IOTV - other assets
34 - GSA Job Order	78 - Adjustment entries
35 - Fedstrip	79 - Closing entries
36 - GSA stores	81 - Labor distribution reports
37 - Printing & medical payments	82 - Depreciation & interest - AMA
38 - Blanket purchase order	83 - Cost estimates
39 - SIBAC/DAFIS control group	87 - Discounts lost
40 - Fixed leases	88 - Discounts lost - cost effective
41 - Rental contracts	89 - Interest/penalty paid
71 - Remai Comuacis	6) - Interest/penaity palu

APPENDIX "E"

PROCUREMENT SITE CODES

23	CG HQ
24	CCGD1
27	CCGD5
28	CCGD7
29	CCGD8
30	CCGD9
31	CCGD11
33	CCGD13
34	CCGD14
35	CCGD17
90	FINCEN
84	MLCLANT
89	MLCPAC
46	Marine Safety Center (through NMC/NPFC)
46	NPFC (also 23 when large purchases are done in CGHQ)
41	TRACEN Yorktown
26	NSFCC
26	Atlantic Strike Team
26	Gulf Strike Team
26	Pacific Strike Team

APPENDIX "F"

APPROVED TRAINING LIST & OTHER USES OF CERCLA FUNDS

Training for District and MSO Personnel

- Advanced Air Sampling EPA
- Air surveillance EPA
- Basic Chemistry

Chemical Information Systems

- Chemical Tanker Safety
- Chlorine Response
- CSTI Modules A&B (equivalent)
- HAZCAT Training UCDAVIS
- Hazardous Chemical Identification
- Hazardous Material Incident Response Course (HMIR) EPA
- HAZMAT Transportation
- HAZWOPER
- Incident Command System (ICS-100, 200, 300 & 400)
- Introduction to Groundwater Investigation
- Marine HAZMAT
- PODC/MSPOC (partial funding by CERCLA)
- Princeton Groundwater
- Removal Cost Management System EPA
- Respiratory Protection NIOSH

Risk Assessment

- Sampling for HAZMAT EPA
- Spill Planning, Exercise and Response System (SPEARS) HAZMAT
- Tank Car Safety

Training for National Strike Force Personnel

- Asbestos Training
- All Manufacturer Courses on HAZMAT Response Equipment (MSA, Bauer, etc.)

Basic Air Monitoring *

- Chemical Tanker Safety
- Chemistry for the Non-Chemist
- Chemistry of Hazardous Materials
- Compressor training
- Confined Space Entry
- Designs for Air Impact Assessment *
- Emergency Medical Technician
- Emergency Medical Technician (re-qual)
- Fire Chemistry 1 & 2 -- NFA
- Handling Radioactive Accidents by Emergency Personnel—REAC/TS
- HAZCAT training (UCDAVIS or equivalent)
- HAZMAT Incident Commander—TTC

- HMIR *
- Incident Command System (ICS-200, 300, 400 and Planning Section Workshop)
- Inland Response *

Instructor Training

Marine Firefighting

OSC2 Training

OSC Crisis Management

Radiation Safety *

- Removal Cost Mgmt System *
- Respiratory Protection
- Risk Assessment *
- Risk Communications Course
- Safety and Occupational Health Coordinator
- SCBA Regulator Repair (high and low pressure systems)
- Shipyard Competent Person
- Tank Car Safety

Tank Car Specialist

- Tankerman/PIC Training (Dangerous Liquids)
 - Transportation of Hazardous Materials
 - Weapons of Mass Destruction **
 - * = EPA provided course
 - **= WMD related or "to be developed" courses (may be funded from other sources)

Activities

- RRT Meetings
- HAZMAT Exercises
- HAZMAT Conferences or Symposiums

Equipment & Materials

- EPA Standard Operating Safety Guides
- Eye Wash Solution
- HAZMAT detection instruments
- HAZMAT personnel protection equipment for responders
- HAZMAT or Chemical Safety Publications
- NIOSH Pocket Guides
- Threshold Limitation Values (TLV) Guides/Index

A. Description of Quarterly Report

The Quarterly Report consists of an Excel form to capture standard data and a freeform narrative section in a separate Microsoft Word document Examples of both follow this description.. Please submit both portions of the report via e-mail.

Section 1, Training.

The following applies to Lines (1-a) and (1-b):

<u>Given</u> This applies primarily to TRACEN Yorktown and training by the NSF. It is prepared and presented by unit personnel. If your unit **hires** an instructor and you fill a room, including personnel from other units or organizations, you are still receiving training.

<u>Received</u> This applies to most training, with the exception of PODC and MSPOC. Personnel attending the resident pipeline training at TraCen Yorktown are reported by TraCen Yorktown.

No. of Persons Enter the total number of persons giving or receiving training. A member who attends (or teaches) two training courses is still only one member. If possible, do not report the same member again in a subsequent quarter of the same fiscal year. A member who both gives and receives training is counted once in each category. This is aimed at identifying the number of people in the Coast Guard's CERCLA training universe.

<u>Total Days</u> Enter the total number of days of training. If three members attend an 8 hour course, this counts as 3 days. Include partial days of training as needed. A half day or 4 hour course is counted as 0.5 day per person attending. Time spent drafting orders and travelling certainly counts, but is tallied on Line (2-j).

The following applies to Line (1-c).

Set Up & Admin applies primarily to TRACEN Yorktown and National Strike Force training, but unit training by a contract or OGA instructor can also require set-up and administrative time. The blanks under No. of Persons are marked "NA" because these are not people trained. Use Line (2-j) to capture the time for writing orders, travel, and other normal workload associated with training.

Section 2, Other Time Estimates.

Include CERCLA National Contingency Plan related activities by all Coast Guard personnel, not just those in reimbursed billets and positions. There are only Total Days blanks in Section 2 and the distinction between Given and Received does not apply. The 10 categories of CERCLA activities are intended to capture all CERCLA work done by the Coast Guard in building or maintaining the capability to respond to HAZSUB incidents. This measure is very important as it is used to calculate the total FTE employed by the Coast Guard for CERCLA work. The FTE data is used to justify the CERCLA reimbursed billets and positions in the Coast Guard. Be totally inclusive of all CERCLA NCP related activity except actual response. Note that it excludes everything related to HAZSUB releases by the Coast Guard (i.e., Environmental Compliance and Restoration).

Section 3, National Response Center.

This Section is for the specialized activities of the NRC. All other units should ignore this Section.

Section 4, Narrative Description of CERCLA Accomplishments.

Follow the directions on the form. The Narrative can help CGHQ and NPFC stay in touch with CERCLA activity in the front line offices, as well as problems or opportunities you are aware of. It provides "ammunition" that NPFC and G-MOR need to defend Coast Guard requests for funding. There is no prescribed length for the Narrative. A couple of paragraphs to a couple of pages is probably reasonable. If there is nothing noteworthy to report for a quarter, please report that; you are not obligated to report trivia.

SURROGATE FOR QUATERLY REPORTS

(For detailed instructions, refer to the CERCLA **Unit / Activity** Management & Support Funding Guide) 1. **Number of Response Personnel** (Total personnel required to be trained) 2. **Training** Given Received No. of Total Total No. of Persons Persons Days Days a.) Listed Courses (See Appendix F of CERCLA Guide for list of courses) b.) Unlisted courses (Please identify unlisted courses in Part 5, Narrative Description of Accomplishments) c.) Set Up & Admin NA NA Other Time Estimates a.) Response f.) Equipment Maint. b.) Planning g.) Property Mgmt. c.) Conferences h.) LEPC Support d.) Meetings I.) SERC Support i.) Other CERCLA e.) Exercises Activity (To be completed by NRC only) 4. **National Response Center** Reports Received **Notifications FOIA Responses** CERCLA Other Narrative Description of CERCLA Accomplishments (Attach on separate page or pages) 5. Attach a narrative description of accomplishments, i.e. events or training that characterize the results obtained from the use of CERCLA non-incident funds. Noteworthy training or meetings are worth mentioning, particularly if they may be models for other units to follow. The degree of response preparedness at units is of special interest, as these funds are ultimately intended for capability building. Recommendations relating to CERCLA Management & Support may be included. Date _____ Signature

B. Example Narrative Section of the Quarterly Report

Narrative Description of CERCLA Accomplishments
From: District 4 FY - xxxx Qtr - 2

Events:

On 17 February MSO Crested Butte responded to the Gehenna landfill where 17 drums of methyl-ethyl-chickenwire were discovered. Nine of the drums were leaking and the Gehenna elementary school had to be evacuated for a week while the drums were overpacked and removed. The four senior responders in the Port Ops division had recently completed HMIR training and the XO commented that the timing was fortunate. The drums posed a real danger to both the responders and the community nearby.

March 2-4, MSO Peapod Harbor collaborated with the training team from the Washington County Fire Department Hazmat Unit to conduct Hazwoper training for members of the Port Ops division and members of the Group Peapod Harbor boat crews. Several members of the city police department and the county Sheriff's department also attended. Participants and observers agreed that the quality of the training was excellent, and the cost was limited to consumables used in training. In addition to being cost effective, the interaction with other area responders is beneficial.

On March 17, the Region XX RRT met in Metropolis. In addition to ongoing business, a discussion of (*the hot issue*) took place and Captain Gotfour, the RRT XX co-chair, suggested a new approach to this problem. (*Describe the new approach*.) The plan was well received, but it will require several member agencies to consult with their legal staffs to assure the legality of their participation. More to follow on this subject.

Recommendation for improved business practice:

Portable computers procured with CERCLA funds in all District 4 units have required replacement of the hard drive. In addition to the cost, this disabled the Cameo capability at those units while the computers were being repaired. The district reprogrammed \$nnnn from this year's CERCLA funds to purchase service contracts for all of these computers, and we expect to save money. The contract can also provide loaner computers under some conditions. We recommend that G-MOR investigate the possibility of a national contract, which should cost less per machine than contracting for each district.

APPENDIX "H" Telephone Numbers of CERCLA Managers

G-OPF (National Response Center)	(202) 267-2184 (SK1)
Marine Safety Center	(202) 366-6482 (CDR)
G-WKS (Medical Support)	(202) 267-2969 (Civilian)
MLCLANT (IH) MLCPAC (IH)	(757) 628-4423 (Civilian) ((510) 437-3591 (CDR)
TRACEN Yorktown	(757) 898-2335 (LT)
G-MOR (Program Manager, Response)	(202) 267-0439 (LT) (202) 267-0421 (CDR)
D-1 D-5	(617) 223-8587 (LCDR) (757) 398-6620 (LT) (757) 398-6364 (Civilian)
D-7	(305) 536-6503 (Civilian) (305) 536-5539 (CPO)
D-8	(504) 589-3642 (LT) (504) 589-4339 (CPO)
D-9	(216) 902-6053 (Civilian) (216) 902-6054 (Civilian)
D-11 D-13	(510) 437-2958 (LT) (206) 220-7222 (Civilian) (206) 220-7221 (CDR)
D-14	(808) 541-2118 (CDR) (808) 541-2118 (SK1)
D-17	(907) 463-2210 (CDR) (907) 463-2816 (Civilian)
NSFCC AST GST PST	(252) 331-6000 X3003 (CWO) (609) 724-0008 (CWO) (334) 441-5914 (CWO) (415) 883-3311 X212 (CWO)
NPFC	(703) 493-6811 (Civilian)